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Attorney for Defendant Leonard Williams

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) NO. CR-S-05-106 GEB
)
Plaintiff,) STIPULATION AND [PROPOSED]
) ORDER CONTINUING STATUS
v.) CONFERENCE AND EXCLUDING
) TIME
LEONARD WILLIAMS,)
) Date: Friday, April 13, 2007
Defendant.) Time: 9:00 a.m.
) Judge: Garland E. Burrell, Jr.
)

BACKGROUND AND DECLARATION OF COUNSEL

At the last hearing, this status conference was scheduled to be heard on Friday, March 30, 2007 at 9:00 a.m. The status of this case is that we are close to a plea agreement but are in the process of possibly working out a stipulation regarding evidentiary guideline matters. It is taking time but we hope to have an agreement in the hands of the Court before April 13, 2007.

For the convenience of the Court and all parties we are requesting this continuance by Stipulation and Order without the necessity of appearance.

1 The balance of the court appearances are requested to be
2 independent from the other named defendants because of 5K
3 considerations.

4 I declare under penalty of perjury that the foregoing is true
5 and correct. Signed at Sacramento, California on March 27, 2007.

6 /s/ Robert M. Holley

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8 Robert M. Holley, Esq.
Counsel for Mr. Williams

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10 **STIPULATION**

11 It is hereby stipulated by and between the defendant, Leonard
12 Williams, through his counsel, Robert M. Holley, Esq., and the United
13 States, through its counsel, Assistant United States Attorney Ken
14 Melikian, Esq., that the status conference presently scheduled for
15 Friday, March 30, 2007 be continued without appearance, for two weeks
16 to Friday, April 13, 2007 at 9:00 a.m.

17 The parties further stipulate that time included in this
18 continuance be excluded pursuant to Speedy Trial Act, 18 U.S.C. Section
19 3161(h)(8)(B)(ii)(Local Codes T2 and T4) until April 13, 2007 due to
20 complexity of the case and in the interest of justice to allow the
21 defense to consider and negotiate an appropriate plea bargain.

22 **Dated: January 17, 2007**

23 /s/ Robert M. Holley

24 Mr. Robert M. Holley, Esq.
Counsel for Mr. Williams

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26 /s/ Robert M. Holley for

27 Mr. Ken Melikian, Esq.
Assistant U.S. Attorney
28 Per telephonic authority

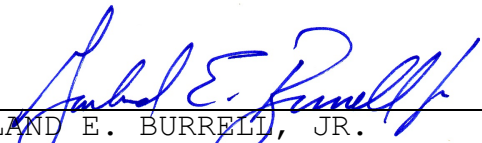
[PROPOSED] ORDER

In the Case of **U.S. v. Leonard Williams**, Cr-S-05-106 GEB, **GOOD CAUSE APPEARING** and upon the stipulation of the parties,

IT IS HEREBY ORDERED THAT the status conference presently set for Friday, March 30, 2007 at 9:00 a.m. be continued to Friday, April 13, 2007 at 9:00 a.m.

It is further ordered that time be excluded through April 13, 2007 pursuant to the Speedy Trial Act exclusion sections set forth in the stipulation above.

Dated: March 27, 2007



GARLAND E. BURRELL, JR.
United States District Judge